


EXHIBIT C

From: Casey Rahn crahn@graelaw.com 
Subject: Re: Alvarez v Kelco - today's call
Date: December 20, 2023 at 5:27 PM
To: Previn Waran pwaran@graelaw.com
Cc: Steven Moser steven.moser@moserlawfirm.com, Mark Grae mgrae@graelaw.com

CR

Steve,

As previously referenced in Previn's earlier correspondence today, enclosed, please find the Amended Notice of Deposition Upon Oral Examination for Mr. Umaña to take place at our offices on December 29, 2023. Should you have any questions, please do not hesitate to contact our offices.

Thanks,

Casey J. Rahn | Senior Associate
GRAE & GRAE, LLC
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crahn@graelaw.com
www.graelaw.com

On Wed, Dec 20, 2023 at 12:57 PM Previn Waran <pwaran@graelaw.com> wrote:

Steve,

I have very limited availability in January, but do have *some* dates on which Defendants' depositions can be scheduled. I am about to go into a deposition, but can provide some prospective dates once I'm out of today's proceedings. As for Plaintiffs' depositions, I do not have the scheduling flexibility to grant any further adjournments of presently scheduled depositions, though Mr. Umaña's deposition has yet to be rescheduled following my adjournment of same as a courtesy to you. I am available on December 29, 2023, to take his deposition, and will serve an Amended Notice of Deposition Upon Oral Examination for Mr. Umaña for such date by EOD, today. Thank you.

Best,

Previn A. Waran | Partner
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On Dec 20, 2023, at 12:50 PM, Steven Moser <steven.moser@moserlawfirm.com> wrote:


Previn

This is to confirm that we will be asking the Court for leave to file a motion for a stay under seal based upon (1) personal/health issues and (2) the defendants' inquiries into alleged attorney misconduct. My understanding is that you are not available to produce the defendants for depositions in January due to scheduling conflicts, and cannot reschedule the depositions of the Plaintiffs due to such scheduling conflicts.




Steven J. Moser
Managing Attorney, Moser Law Firm, PC




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Chicas, re-23-12-20 - Amended
Noti ce of Deposition (Mateo...

